

March 31, 2018

Letter of Appeal
Ms. Marlene H. Dortch
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.
CC Docket No.02-6

In re:
Billed Entity Number:
Appellant: E rate Solutions Group
Applicant: East Bay School for Boys BEN 17017826

Fund Year: 2018 FCC Form 471: 181042161 (category 1) and 181042162 (category 2)

Dear Ms. Dortch:

This is a "Letter For a Waiver of the time to file for 471 Apps Fund Year: 2018 FCC Form 471: 181042161 (category 1) and 181042162 (category 2) due to various inherent flaws in USAC's EPC system as described in detail in Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC ("Epic") Portal system, and USAC as a whole, have "serious flaws." that still persist in addition to various weather issues/Nor'easters and internal school issues.

Reported EPC issues were as follows:

- There were repeated problems and various outages with the EPC Portal input system, during which users could not access or upload necessary data.
- Necessary tools, such as the Category 2 (Wi-Fi Equipment) budget tool were repeatedly inaccurate and misleading to filers.
- USAC instituted an arbitrary lock-down of data that prevented the update of filers' account portals.
- Unexplained blocks on the filing of Forms 471 occurred, preventing the necessary filing of forms prior to the close of the filing window, and/or necessitating filing for benefits under an incorrect entity identification.
- Filers faced barriers to filing proper Forms 471 due to incorrect data in the USAC system for enrollment figures and numbers.

The Chairman specifically instructed USAC to “identify alternative options to assist applicants even in the event of IT failures.” In our case, such IT failures and other numerous problems evident in the USAC system and structure and other issues listed above have prevented our filing of the proper Form 471 prior to the March 22, 2018, filing window closing

Therefore we are formally requesting a Waiver of the time to file to allow USAC to correct the EPC system error which is preventing the filing of the above referenced form 471's since the applications were filed on March 31, 2018 which is within 14 days of the March 22, 2018 filing deadline.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

Katherine M. Weiss

Consultant
